

In The United States District Court
Eastern Division of Pennsylvania

Larry Wisser)	
And)	
Cathleen Wisser)	
Plaintiffs)	Cause Number <u>21-5017</u> <u>21-5110</u>
Vs)	
Mr. Bruce Brown Individually)	
And as Agent for United States)	
Dept. Agriculture)	NOTICE
The United States)	Motion for TRO
Department of Agriculture)	Motion for Injunction
)	<i>Motion For Stay</i>
)	<u>JURY TRIAL DEMANDED</u>
John and Jane Does 1-10)	
yet to be identified)	
Defendants)	Plaintiffs
)	Affidavit in Support of Injunction

**Amended -Reurged Motion for Stay - TRO and Permanent
Injunction**

Now Comes Larry and Cathleen Wisser, Plaintiffs and herein state under
the Penalty of Perjury as follows per Rule 65 of the Federal Rules of Procedure

Plaintiffs Request this Court to hear this Reurged Motion for Hearing on this Restraining Order as soon as the Court's Calender Permits.

1. **Accurate Affidavits and Preliminary Exhibits have been filed with this Court showing that the Defendants for many years VIOLATED the Freedom of Information Act and Concealed and Hid Files and Records germane to the Wissers and Their Farm. Using false billings to violate Pennsylvania's Fair Debt Collections laws is as well violative of the Federal Fair Debt Collections Laws.**
2. **This Court has concurrent jurisdiction over Open Records and Credit Collections Practices of Pennsylvania State and FederalLaws.**
3. **The Records associated with the abusive and false billings by USDA and Mr. Bruce Brown as well as Union National Bank and Northwest Banks, show more than \$100,000.00 of Farm Preservation Monies handled by USDA and Mr. Bruce Brown in connection with the Wisser Farm were by ATM or Electronic Banking Transactions deprived from the Wissers and NOT properly credited to Wisser Accounts. Larry and Cathy Wisser NEVER MADE ELECTRONIC Payments, Debits or Withdrawls from the Banking Accounts ONLY USDA and Defendant Bruce Brown did Electronic Transactions.**
 - A. **More than \$200,000.00 given to USDA to USDA and Mr. Bruce Brown / USDA's by the Banks was never accessible by or to the Wissers. USDA and Mr. Bruce Browns ELECTRONIC BANKING FILES are even at this date being concealed and hidden. Pennsylvania and Federal Open Records Laws continue to be violated.**

- 4. The Records of Electronic Payments made by USDA and Bruce Brown regarding operations and debts servicing or connected to the Wissers and Their Farm have been withheld and secreted by Bruce Brown. USDA and Mr. Brown continue to Hide and Secret Electronic Transactions involving more than \$100,000.00 traceable to Land O Lakes Milk Accounts from which USDA and Defendant Bruce Brown collected on for several years. The USDA and Defendant Bruce Brown has yet to produce USDA's Records and Files regarding these payments in violation of the Freedom of Information Act.**
- 5. Electronic Collections or Electronic Banking Records, Payments, Deposits, Withdrawals from Wisser Banking Accounts , associated with the Fictitious Payments for a \$40,000.00 Bulk Milk Tank and a Large Silo Mr. Brown claims to have ELECTRONICALLY Financed and Paid For have been secreted and hidden by Mr. Bruce Brown. The Wissers NEVER received the Monies nor the Milk Tank and Silo NOR has Defendant Bruce Brown provided Files and Records regarding these items.**
- 6. Payments Collections Withdrawals or Deposits records and authorization contracts or records which Authorise USDA to withdraw money, make payments from or deposit funds or checks to the Bank Accounts of the Wissers and Their Farm traceable to Paying Off a Large \$102,000.00 Lien on the Wisser Farm supposedly owed to Blue Ball Bank, or rather BB&T Bank have ever been produced by USDA or Bruce Brown. Said records and receipt for this payment have been secreted and withheld by Mr. Bruce Brown and the USDA for many years in violation of the Freedom of Information Act.**

7. Sales receipts from the Wissers' Cow Herd taken by USDA and Mr. Bruce Brown , how those Sales Monies were Credited to the Wissers and Their Farm and the whereabouts of these monies have been hidden and secreted by Mr. Bruce Brown.
8. The AUTHORISATION agreements or Permission Records for Mr. Bruce Brown and USDA to Electronically access Wissers Bank for Deposits, Withdrawals or Electronic Transactions , these Records of financial payments, Withdrawals, Deposits or Collections associated with the Wissers and Their Home and Farm have been secreted and concealed by Mr. Bruce Brown. The Land O Lakes records still have NOT been produced nor properly credited to the Wissers Accounts.
9. The Original Wet Ink papers of the records Wissers have spent 7 Years demanding from USDA and Mr. Bruce Brown under Freedom of Information Act (which were partially just recently produced) the bulk of the records and files STILL HAVE NOT BEEN PRODUCED.
10. On the very day USDA and Bruce Brown's partial records release to the Wissers did occur on October 28th 2021 The US Bankruptcy Court dismissed the Wissers Chapter 12 Case before the Evidence could be shown to the Court regarding USDA's Bruce Brown's SKULLDUGGERY and Concealment of fthe Files and Records.
11. These records should include any written or stated exemptions under FOIA justifying the many years USDA and Mr. Bruce Brown stonewalled and refused the FOIA records production.

NOTE NOT A SINGLE Exemption from Producing the Files and Records has ever been stated by USDA or Bruce Brown. Properly stated exemptions are MANDATORY.

12. The Account Number/s of all Electronic Financial Accounts used by Bruce Brown or USDA in transactions of payments, collections, Withdrawals or Deposits involving Wissers and Their Farm have been concealed and hidden by Mr. Bruce Brown and the USDA for many years and USDA and Bruce Brown FRAUDULENTLY pursue collections and FORECLOSURE on the Wissers Farm and Property in violation of the FAIR DEBT COLLECTIONS PRACTICES ACT and by means of BAD FAITH and Fraudulent Means in the Courts of the United States and those of the State of Pennsylvania.

MOTION FOR STAY - RESTRAINING ORDER - INJUNCTION

As stated in Plaintiffs ORIGINAL Affidavits, Complaint and herein AGAIN Plaintiffs reurge and again Move this Court for a Hearing to be had on an EMERGENCY BASIS. Irreparable Harm and Great Hardship and Damages will be caused UNLESS a Temporary Restraining Order issues from this Court until such time as a HEARING Can Be Set and Heard at which time Plaintiffs are entitled to an Injunction against USDA and Mr. Bruce Brown to HALT and CEASE Immediately the Fraudulent Billings, Collections and Efforts to Seize and Sell Their Farm and Property. Plaintiff's Pray for this relief and as follows.

1. All costs and expenses associated with this NOTICE Motion and Hearing.

2. That a full and proper Reconciliation of Their Accounts with USDA and Mr.

Bruce Brown be ORDERED

or payed the neighbors so and call the neighbors.
And Northwest Bank Two
Cause Northwest Bank gave Bruce Brown 255,000.00
and we didn't know that till now, we subpoena
Charles Shurr Jr Egs 17 years later Bruce Brown payed

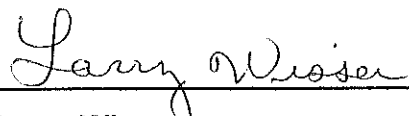
- a. That upon Showing and Trial The Damages and Costs, Expenses demanded in Plaintiff's Original Complaint be Ordered Paid to the Plaintiffs / Moveants as set forth in Plaintiffs Original Complaint.

Plaintiffs Request a DATE and Time / Place be set by this Court to hear this Motion for Hearing on this Restraining Order as soon as the Court's Calendar Permits. False Billings and Concealed Records are NOT ALLOWED by State or Federal Laws. This Court has concurrent jurisdiction over the State and Federal Laws.

Notary Jurat

I Mr. Larry Wisser and I Mrs. Cathay Wisser herein state that under the Penalty of Perjury the Above Representations and Statements are Accurate and Truthful to the Best of Our Belief and Knowledge.

Mr. Larry and Cathy Wisser after having shown Proof of Their Identities do herewith execute this Affidavit in Connection with the Federal Lawsuit indicated upon this Affidavit. See Attached Records and Statements of Mr. Larry and Cathy Wisser.



Larry Wisser

Cathy Wisser
Cathy Wisser

Respectfully

Cathy Wisser
Larry Wisser
Larry and Cathy Wisser

Dated

Address of the Plaintiffs

8149 BAUSCH ROAD
NEW TRIPOLI, PA. 18066

NOTARY STAMP AND ENDORSEMENT

Subscribed and sworn before me, this 8th
day of Feb, 2022, a Notary Public
in and for Lehigh County,
State of PA

Ruth R. Miller
(Signature)

NOTARY PUBLIC

My Commission expires 4/17, 2022

Commonwealth of Pennsylvania - Notary Seal
Ruth R. Miller, Notary Public
Lehigh County
My commission expires April 17, 2022
Commission number 1112853
Member, Pennsylvania Association of Notaries

Certificate of Service

On this Day 8th Feb 2022 a copy of this AFFIDAVIT was by US Mail sent to USDA and Mr. Bruce Brown at the following address. Copy was sent to Mr. Scott Waterman at the Address indicated below.

Larry and Cathy Wisser

Cathy Wisser
Larry Wisser
DATED

Subscribed and sworn before me, this 8th
day of Feb, 2022, a Notary Public
in and for Lehigh County,
State of PA
Ruth Miller
(Signature)
NOTARY PUBLIC
My Commission expires 4/17 2022

Commonwealth of Pennsylvania - Notary Seal
Ruth R. Miller, Notary Public
Lehigh County
My commission expires April 17, 2022
Commission number 1112853
Member, Pennsylvania Association of Notaries